

Servings and milligram-per serving labeling for orally administered medical cannabis products

Medical Cannabis Policy Advisory Board, 7/18/2023

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Questions for today

1. Should servings and milligrams of certain cannabinoids per serving be required on orally administered medical cannabis products?
2. Where should this information be required to appear?
3. For liquid products, should a measuring device be included from the processor?

Background

Utah requires that orally administered medical cannabis products provide on their fact panels the total milligram content and total amount of THC, CBD, and any known cannabinoid greater than 1% of the total cannabinoids present.

Utah doesn't require orally administered medical cannabis product labels or fact panels to list cannabinoid milligram content per piece or milliliter, nor a standard serving.

Example

A package containing 10 capsules totaling 100 mg of THC must be labeled as such, but the label doesn't need to state each capsule contains approximately 10 mg of THC.

Concerns with current law

- Only some medical cannabis pharmacies carry orally administered products labeled with milligrams per serving.
- Calculations may be simple for pharmacists, but can be complicated for patients.
- Products with more than one advertised cannabinoid are harder to calculate, as are oral mucosal (liquid) products.

Other states' dosing laws

- **16 states** set their THC limit for orally administered cannabis products to 10 mg “per serving” or “in a single serving,” meaning one piece or per a measurement in milliliters.
- **12 states** with a medical cannabis program require serving information directly on orally administered cannabis products' labels.
 - **5 states and 1 territory** require THC and CBD listed per serving.
 - **2 states** require per serving information for “any other marketed cannabinoid” or “any other cannabinoid listed or described in the label or packaging.”
- **7 states** require physical demarcation, separation, or individual wrapping of edibles by serving.
- **5 states** require the product to include a measuring device, if applicable.

Basis for inclusion

1. Patients can better understand what and how many cannabinoids they are taking from a multi-serving product that is intended to be orally administered.
2. Cannabinoids-per serving can prevent overconsumption.
3. Patients and pharmacists would no longer be required to calculate milligrams per serving, which can cause confusion.

Comparison with (right) and without (left) dose/serving information

Total THC per Package: 296mg
Processor: Zion Alchemy
License: 7002-20202
Batch: IM23185-FP
Tested: 05/24/2023
Packaged: 05/15/2023

Cannabinoids:
Δ9-THC : 296mg
CBN : 305mg
CBD : 3,060mg
CBC : 132mg
CBDV : 25.5mg
CBG : 78.0mg
ExpDate: 05/24/2025
Total THC: 10.2mg/g

Ingredients:
MCT Oil,
Phytocannabinoids,
Lavender Oil,
Terpenes
NET WT.: 29g
Extracted by: ethanol
Solvents: ethanol

WARNING:
Cannabis has intoxicating effects and may be addictive. Do not operate a vehicle or machinery under its influence. KEEP OUT OF REACH OF CHILDREN.



Mint Chocolate
Tincture - 1 Oz (30ml)

Batch #PR.230421
Testing Date: 5/02/23
Packaged Date: 4/21/23
Cannabinoid Profile:
Δ9 THC: 49.75mg/g
CBD: 43.86mg/g
CBG: 62.73mg/g
Expiration Date: 4/21/24
Total THC %: 4.97%
Total THC: 49.75mg/g
Total THC Per Bottle: 1,378.1mg
Total CBG Per Bottle: 1,737.6mg
Total CBD Per Bottle: 1,214.9mg

1ml Dose Contains 45.9mg THC,
57.9mg CBG, 40.5mg CBD

Ingredients: Organic MCT Coconut Oil, Cannabis Oil, Peppermint Essential Oil, Cocoa Absolute, Rebaudioside A
Net Weight: 1 Ounce
Extraction Method: Ethanol
Pkg ID: BVMIMIN000000135

Industry impact

1. Changes to current packaging processes, including label redesign.
2. New packaging may be necessary for some to accommodate additional information.
3. Additional packaging costs may be passed on to patients.

10mg Vegan THC Gummy Raspberry 1:1 (THC:CBD)

Total THC per Package: 104mg

Processor: Zion Alchemy / License: 7002-20202

Batch: IM22215-FP / Tested: 08/05/2022 /

Packaged: 07/28/2022 / Cannabinoids per cube:

Δ9-THC: 10.4mg, CBD:10.2mg, CBG: 0.50mg /

Exp Date: 08/05/2023 / Total THC: 2.50mg/g

Ingredients: Sugar, Tapioca Glucose, Water,
Sorbitol, Agar, Sucrose, Locust Bean Gum, Corn
Starch, Citric Acid, Natural and Artificial Flavors,
Phytocannabinoids, Natural and Artificial
Colors / NET Weight. 40g / 10 count

On this fact panel, Zion includes a "Cannabinoids per cube" section, denoting 10.4 mg THC, 10.2 mg CBD, and 0.50 mg per cube.

Batch: PR.230517G

Test: 06/02/2023

Packed: 2023-05-19

Potency mg/g: THC: 4.72 MG, CBD: 4.68 MG

Exp: 2023-11-19

THC Mg/g: 4.720

Ingredients: Corn Syrup, Sugar, Water, Gelatin, Peach
Puree, Natural Flavors, Contains 2% or less of: Mango
Puree, Fruit and Vegetable Juice (for color), MCT Oil,
Cannabis Extract, Pectin, Terpenes, Citric Acid | Allergens:
Coconut

20 pieces - Net Wt: 90 GR

Extraction And Solvent: Hydrocarbon: -

Processor: True North of Utah Lic.: 7002-20407

Total THC(mg): 424.8mg THC | Per Cube: 21.24mg THC

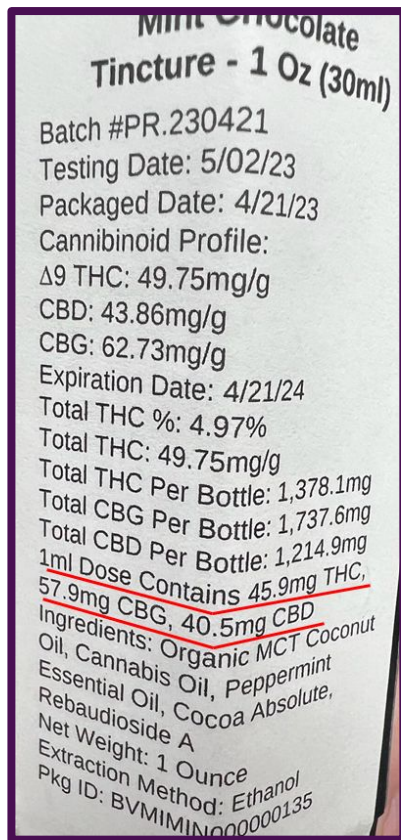
HV-GC-20ea Boost ER



VBXLHVGLCR999991

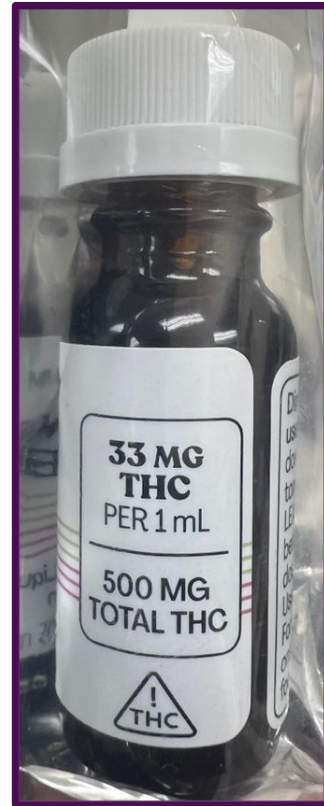
A 20 mg THC High Variety edible containing a 1:1 (one to one) ratio with CBD. While THC per cube is included, CBD is not.

Edible example packaging



A Fruit of Life
tincture
indicating a 1
milliliter dose
and its 3 primary
cannabinoids in
milligrams per
dose.

A Boojum
tincture boldly
labeling THC
content in
milligrams per
milliliter.



Oral mucosal (liquid) example packaging

What cannabinoids should be required?

- Solely THC?
 - THC and CBD?
 - THC, CBD, and additional advertised cannabinoids?
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Where should this information be required to appear?

- On the fact panel provided by the processor?
- On the product label?
- On the pharmacy's website?

Questions to answer

1. Should servings and milligrams of certain cannabinoids per serving be required on orally administered medical cannabis products?
 - a) What cannabinoids should be required?
2. Where should this information be required to appear?
 - a) On the container or package?
 - i) on the fact panel; or
 - ii) on the product label?
 - b) On a pharmacy's website?
3. For liquid products, should a measuring device be included by the processor?

Board comment